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November 28, 2022

**VIA ELECTRONIC FILING**

The Honorable Brian M. Cogan  
United States District Judge  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Aretha Crosson v. Verve Labs, Inc.**  
**Case No. 22-cv-6173-BMC**

Dear Judge Cogan:

We represent the Plaintiff in the above-referenced matter. This is a website accessibility case where defendant has a physical location (a store in NYC). An Initial Status Conference is scheduled for November 30, 2022 at 10:15 a.m. Defendant was served on October 18, 2022 and has failed to respond. On November 17, 2022, I reached out to Defendant by email to see what their intentions were and notified them of the Initial Conference and the requirement to file documents in advance of the conference. Defendant advised me that they were not aware of the lawsuit and on November 27, 2022 advised me that they are looking for counsel to represent them. Defendant refuses to participate in the preparation of a Joint Letter or Case Management Plan.

Plaintiff respectfully requests that the Initial Conference be adjourned for two weeks to allow Defendant to retain counsel. In the event that Defendant fails to retain counsel prior to the adjourned date, Plaintiff proposes to submit a Request for Default on or before December 30, 2022.

Thank you for your consideration.

Respectfully submitted,  
*/s/ Dan Shaked*  
Dan Shaked, Esq.

cc: Sayyid Markar for Defendant (by email)